

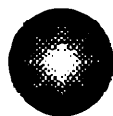
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Medical/Industrial Hygiene

111 Market Place
Suite 530
Baltimore, Maryland 21202-7110

DEPT OF TRANSPORTATION

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**Constellation
Energy Group**

FMCSA-01-9800-40

September 26, 2001

Docket Management Facility
U.S. Department of Transportation
Room PL-401
400 Seventh Street, S.W.
Washington, D.C. 20590

Dear Director, Docket Management Facility, US DOT:

The Maryland Department of Motor Vehicles has decided to discontinue all intrastate waivers for insulin-dependent diabetics effective April 2002. This step on the part of the DMV will have a significant negative impact on employees' of the Constellation Energy Group who drive commercial vehicles.

For years the issuing of waivers has allowed drivers with outstanding driving histories and unblemished DMV records remain a productive part of our workforce. Currently, there are 8 employees anxiously awaiting approval for waivers. These employees have a combined commercial driving history of 159 years of safe driving, a record (accidents/tickets issued) easily surpassing the average of all other drivers. In the entire history of our company, only 2 preventable motor vehicle accidents have involved this group of individuals. These accidents were not attributable to their diabetes.

Without intrastate waivers our insulin-dependent drivers' jobs will be in jeopardy. Our experience does not support the notion that diabetics are an increased safety risk on the road. We strongly urge reconsideration of the Maryland DMV decision.

Sincerely,

Susan Guarnieri, MD
Medical Director, Constellation Energy Group